

MAY 10 2006

**MARY L.M. MORAN**  
**CLERK OF COURT**

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*Attorneys for Defendant James J. Dino*

**IN THE UNITED STATES DISTRICT COURT OF GUAM**

UNITED STATES OF AMERICA,

vs.

JAMES J. DINO,

Defendant.

CRIMINAL CASE NO. CR04-00016

**MOTION TO CONTINUE SENTENCING  
HEARING**

The undersigned request to continue the sentencing hearing currently set for May 16, 2006 at 10:30 a.m. to a date three (3) months later. This continuance is requested by the defense on the following grounds:

1. The defense is not ready to proceed to sentencing and needs additional time to address sentencing issues.
2. The defense intends to submit memoranda concerning the amount of drugs attributable to the Defendant.
3. The defense intends to submit memoranda concerning whether sentences should be consecutive or concurrent.
4. The defense is still examining PSR issues and needs additional time to make sentencing arguments to the Court.
5. Defendant faces substantial incarceration exposure and the defense wants to ensure all sentencing issues are addressed.

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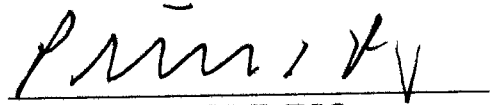
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- 1 6. The Defendant is pursuing further cooperation opportunities with the government.  
2 7. The government has no objections to the continuance

3 Dated this 5<sup>th</sup> day of May, 2006.


4 **LUJAN AGUIGUI & PEREZ LLP**

5  
6 By:

  
7 **PETER C. PEREZ, ESQ.**  
8 *Attorney for Defendant James J. Dino*

9 **NO OBJECTIONS:**

10 United States Attorney  
11 Districts of Guam and NMI

12   
13 **FREDERICK A. BLACK, ESQ.**  
14 *Assistant U.S. Attorney*